

EXHIBIT XX

Quintel, Laurie

From: Quintel, Laurie
Sent: Wednesday, March 01, 2006 8:26 AM
To: 'Greg Pullman'
Subject: Clarification regarding SEIU representation

Greg:

Thank you for your reply. Your response does raise a question. The collective bargaining agreement we have with SEIU is between the Hospitals and SEIU Local 715. You have told me that I should be working with Ella Hereth.

On her correspondence, Ms. Hereth identifies herself as follows:

Ella Hereth
Field Representative
SEIU United Healthcare Workers West
1338 Mission St.
San Francisco, CA 94103
phone (415)503-5740
fax (415)563-9914
ehereth@seiu-uhw.org

Additionally, last week Ms. Hereth brought Rachel Deutsch to my office. Ms. Deutsch indicated that UHW would be taking over representation for the hospital. The Hospitals have not received any such notification.

I would like to receive clarification.

Regards,

Laurie J. Quintel
Manager - Employee Labor Relations
*-lquintel@stanfordmed.org
*Ph: 650-725-2770
7Fax: 650-723-2370
mailing address: 300 Pasteur Drive

Stanford, CA 94305-5513 office location at 1510 Page Mill Drive

-----Original Message-----

From: Greg Pullman [mailto:gpullman@seiu715.org]
Sent: Tuesday, February 28, 2006 11:16 AM
To: Quintel, Laurie
Cc: Ella Hereth
Subject: RE: Contract Books and other issues

Laurie,

I got your correspondence. We are working on the dues forms. Ella will be in touch with you about the grievances/ULP settlement.

Greg

Quintel, Laurie

From: Greg Pullman [gpullman@seiu715.org]
Sent: Wednesday, March 01, 2006 11:10 PM
To: Quintel, Laurie
Cc: rdeutsch@seiu-uhw.org; ehereth@seiu-uhw.org
Subject: RE: Contract Books and other issues

Laurie,

I am writing in response to your request for clarification. I want to confirm that SEIU Local 715 represents the workers covered by our agreement at Stanford Hospital and Clinics, that they are members of Local 715, and that the contract is with Local 715. This will further confirm that Local 715 has entered into an agreement with SEIU UHW to help service the Local 715 members at the Hospital. Local 715 will still have ultimate responsibility for the contractual and representational relationship, but Local 715 has asked SEIU UHW to service this unit in many ways on a day-to-day basis.

Therefore, the representatives you will see representing Local 715's members in the unit will be individuals from SEIU UHW providing these services. You should expect to see Local 715's members serviced by UHW representatives including Ella Hereth and Rachel Deutch. If you have any need for further clarification, please do not hesitate to contact me.

Greg Pullman
Staff Director
SEIU Local 715

-----Original Message-----

From: Quintel, Laurie [mailto:LQuintel@stanfordmed.org]
Sent: Tuesday, February 28, 2006 10:34 AM
To: Greg Pullman
Subject: FW: Contract Books and other issues

Greg:

I understand that you were out of your office last week. I sent you several pieces of correspondence during that time. I wanted to confirm the message you sent me previously, February 6, that you remain the primary contact and will respond to my letters.

Thank you,

Laurie J. Quintel
Manager - Employee Labor Relations
*-lquintel@stanfordmed.org
*Ph: 650-725-2770
*Fax: 650-723-2370
mailing address: 300 Pasteur Drive
Stanford, CA 94305-5513 office location at 1510 Page Mill Drive

-----Original Message-----

From: Greg Pullman [mailto:gpullman@seiu715.org]
Sent: Monday, February 06, 2006 12:54 PM
To: Quintel, Laurie
Cc: Ella Hereth; Ricardo Ramirez
Subject: RE: Contract Books

Laurie,

I will be your primary contact on the new agreement. Ella Hereth and Richard Ramirez remain worksite organizers for now. I will get you a steward list later in the week.

It would be helpful to have the following information:

- 1) Process and timeline for getting agreement printed.
- 2) Date for raise implementation in payroll and any retro pay owed.
- 3) Confirmation that the hospital has resumed dues deductions as of the ratification date.
- 4) Whether or not the hospital is interested in meeting to try to work out resolutions to the ULPs and grievances filed during the last few months.

Thanks,

Greg

-----Original Message-----

From: Quintel, Laurie [mailto:LQuintel@stanfordmed.org]

Sent: Mon 2/6/2006 8:10 AM

To: Greg Pullman

Cc:

Subject: FW: Contract Books

Greg:

Now that we have successfully completed negotiations, I will be working on coordinating publishing the new agreement. Can you tell me who will be my primary contact? I ask as Ella copied you on her inquiry to me. Will it be you?

Also, to assist me and the Employee Relations Team in working with the SEIU would you please confirm the following:

* The current SEIU staff assigned to work with employees at SHC and LPCH

* Current list of stewards, including the chief steward for each hospital

Thank you in advance for your assistance,

Regards,

Laurie

Laurie J. Quintel

Manager - Employee Labor Relations

*-lquintel@stanfordmed.org <mailto:lquintel@stanfordmed.org>

*Ph: 650-725-2770

*Fax: 650-723-2370

mailing address: 300 Pasteur Drive

Stanford, CA 94305-5513

office location at 1510 Page Mill Drive

-----Original Message-----

From: Ella Hereth [mailto:ehereth@seiu715.org]
Sent: Friday, February 03, 2006 5:30 PM
To: Quintel, Laurie
Cc: Greg Pullman
Subject: Contract Books

Dear Laurie,

What is the status of printing the contract books? Please let me know what you need from us to do this. Thank you.

Sincerely,

Ella Hereth

WorksiteOrganizer

SEIU 715

(650) 723-3644



LOCAL 715

www.seiu715.org

SERVICE EMPLOYEES INTERNATIONAL UNION, AFL-CIO/CLC

May 1, 2006

Laurie J. Quintel
Manager, Employee and Labor Relations
Stanford Hospital and Clinics
300 Pasteur Drive
Stanford, CA 94305-5513

Dear Laurie,

You have sent me a number of pieces of correspondence regarding approving the agreement and access issues. As I have previously explained to you, Local 715 has a service agreement with SEIU-UHW to handle all representational matters at Stanford and Lucille Packard Hospitals. They have authority from us to approve the contract language and to deal with any matters regarding access, database lists, grievances, etc.

Rachel Deutsch is the lead organizer for the hospitals. Ella Hereth and Jocelyn Olick are also assigned. Please direct your correspondence to them. Please cooperate with them on questions about list matters and contract production.

Thank you for your cooperation.

Sincerely,

Greg Pullman
Staff Director

cc. Rachel Deutsch, Ella Hereth, Jocelyn Olick- SEIU- United Healthcare Workers
1338 Mission St, San Francisco, CA 94103

GP:jb opeiu local 29 afl-cio
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Stanford/Chapters/Stanford Hospital & Clinics/ USW Hosp LQuintel-UHW 050106.doc

GC Exhibit #

8

Laurie J. Quintel
Director - Employee Labor Relations
*-lquintel@stanfordmed.org
*Ph: 650-725-2770
7Fax: 650-618-2246
mailing address: 300 Pasteur Drive
Stanford, CA 94305-5513
office location at 1530 Page Mill Drive

-----Original Message-----

From: Greg Pullman [mailto:gpullman@seiu715.org]
Sent: Monday, May 22, 2006 5:11 PM
To: Sun-Young, May; jolick@MAIL.SEIU-UHW.ORG
Cc: rdeutsch@mail.seiu-uhw.org; Quintel, Laurie
Subject: RE: Julio Andrade's grievance

May,

I have explained numerous times that Jocelyn Olick, Rachel Deutch and Ella Hereth out of the SEIU UHW San Francisco office are handling all representation matters for SEIU Local 715. Local 715 has the right to designate whomever we chose to handle representation matters. Your continued refusal to accept that fact appears to be a clear attempt to deny representation to the workers we represent. I don't know how to say this any more clearly- please direct all correspondence on matters regarding representation of the SEIU Local 715 unit to these three people at the office that they work out of.

Greg Pullman
SEIU Local 715

-----Original Message-----

From: Sun-Young, May [mailto:MSunyoung@stanfordmed.org]
Sent: Mon 5/22/2006 4:23 PM
To: jolick@MAIL.SEIU-UHW.ORG
Cc: Greg Pullman; rdeutsch@mail.seiu-uhw.org; Quintel, Laurie
Subject: Julio Andrade's grievance

Jocelyn,

I'll fax a copy of a letter from Laurie Quintel to your fax number in San Francisco as a one-time exception. Please note that Greg Pullman confirmed that SEIU Local 715 has the ultimate responsibility for the contractual and representational relationship with SHC and LPCH. Therefore, we will continue to send all correspondences to Local SEIU 715 unless we receive written authorization from SEIU Local 715 stating otherwise.

Julio's former manager and I are available on Friday, June 2 from 9:30-10:30 to meet with you and Julio Andrade. We will be glad to meet you at SEIU 715 office on campus.

May Sun-Young
Sr. Employee Labor Relations Specialist
MC 5513
ph: 650-497-8690
fax: 650-618-2259 or 723-2370

-----Original Message-----

From: Jocelyn Olick [mailto:jolick@MAIL.SEIU-UHW.ORG]
Sent: Monday, May 22, 2006 12:31 PM
To: Sun-Young, May
Cc: rdeutsch@MAIL.seiu-uhw.ORG
Subject:

Dear May,

I am writing in response to an e-mail that you sent to Greg Pullman, for me, on Friday May 19, 2006. First of all I would like to reiterate that I and Ella Hereth do not work for SEIU 715. SEIU-UHW is doing the representation work here at Stanford Hospital; please direct all your correspondence here. Secondly, I am assuming none of the three days that I proposed work for you for the grivance meeting for Julio Andrade, since have given two new dates. Unfortunately, neither May 24, 2006 nor June 1, 2006 work for me. Here are some new proposed days: Friday May 26, 2006 between 9:30 -12pm., Wednesday May 31, 2006 between 1pm and 4pm and Friday June 2, 2006 between 9:30-12pm. For the formalities of the meeting, having a grievance meeting via telephone is ridiculous and unacceptable. Since the HR department has decided to ban the union representatives from the hospital and I am still the union representative for Stanford, we will have to have the meeting off sight. Please respond immediately so I can confirm Mr. Andrade's availability.

Sincerely,

Jocelyn Olick
Union Representative/ Organizer
1338 Mission St.
San Francisco, CA 94103
Phone (510)773-7102
Fax (415)563-9914

Sent via the WebMail system at MAIL.SEIU-UHW.ORG



Quintel, Laurie

From: Greg Pullman [gpullman@seiu715.org]
Sent: Tuesday, May 30, 2006 5:58 PM
To: Quintel, Laurie
Cc: ehereth@MAIL.SEIU-UHW.ORG
Subject: RE: Service Credit and Contract Printing

Laurie,

As I've previously told you, I've designated Ella as the authority on this matter and there is no reason for you to doubt that her communications are representative of Local 715's position. Please proceed with the direction Ella has given you.

Greg Pullman

-----Original Message-----

From: Quintel, Laurie [mailto:LQuintel@stanfordmed.org]
Sent: Tuesday, May 30, 2006 3:17 PM
To: Greg Pullman
Subject: FW: Service Credit and Contract Printing

Greg:

As I told you in my letter to you dated May 25, 2006, Ella Hereth is not the appropriate person to make a decision regarding any terms and conditions of the newly bargained agreement. I do not consider her e-mail below as authority to accept the revision to 5.3.1.

Please send me a response from one of the three sources as stated in my May 25 letter, so that I can proceed with publishing the contract.

Laurie J. Quintel
Director - Employee Labor Relations
*-lquintel@stanfordmed.org
*Ph: 650-725-2770
*Fax: 650-723-2370
mailing address: 300 Pasteur Drive
Stanford, CA 94305-5513 office location at 1510 Page Mill Drive

-----Original Message-----

From: Ella Hereth [mailto:ehereth@MAIL.SEIU-UHW.ORG]
Sent: Friday, May 26, 2006 6:38 PM
To: Quintel, Laurie
Cc: jolick@seiu-uhw.org
Subject: Service Credit and Contract Printing

Laurie

In regards to the service credit language in the contract, we have discussed the changes that you have proposed. Though not explicitly expressed in the Tentative Agreement, we have heard your concerns and we are willing to agree to the changes that you are suggesting.

You should be receiving the signature page shortly if you have not already received it. As I understand it, that was the last thing we needed to settle before the contract could be sent to the printer.

Please contact me if you have any questions.

Ella Hereth
Field Representative/Organizer
SEIU United Healthcare Workers West
1338 Mission St.

GC Exhibit # | |

San Francisco, CA 94103
phone (415)503-5740
fax (415)563-9914

Sent via the WebMail system at MAIL.SEIU-UHW.ORG

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larnold@foley.com EMAILCLIENT/MATTER NUMBER
085437-3000

June 7, 2006

VIA FACSIMILE AND U.S. MAILGreg Pullman
Staff Director
SEIU, Local 715
2302 Zanker Road
San Jose, CA 95131-1115**Re: Stanford Hospital & Clinics and SEIU, Local 715**

Dear Mr. Pullman:

I write on behalf of Stanford Hospital & Clinics and Lucile Packard Children's Hospital. Not long after the contract negotiations were completed, you wrote Laurie Quintel to advise that certain individuals employed by SEIU-UHW were going to be utilized on behalf of SEIU Local 715 to assist in contract administration. When the Hospitals initially raised the issue of their use and SEIU Local 715's status as the exclusive representative of the employees in the bargaining unit at the Hospitals for which it is certified, you responded with assurances that SEIU Local 715 remained the exclusive representative. Accordingly, the Hospitals accepted this assurance, and assumed that SEIU Local 715 was having staffing difficulties for which UHW was supplying manpower assistance until they could be addressed within SEIU Local 715.

Subsequent events and statements now lead the Hospitals to the conclusion that more may be involved. The Hospitals have received letters from union counsel, who represent both SEIU Local 715 and UHW, referring to arbitrations at the Hospitals and referencing, as the labor organization, "SEIU-UHW (formerly SEIU Local 715)." The Hospitals have also received letters from counsel requesting that deducted dues be paid directly to UHW, and making requests for information that is to be sent directly to UHW. Virtually all correspondence has, until the last few days, been on UHW letterhead with no mention of SEIU Local 715. While the Hospitals have recently received correspondence with the SEIU Local 715 letterhead pasted onto earlier correspondence received from UHW on UHW letterhead (and returned by the Hospitals), the text in many cases still refers to grievances filed by UHW on behalf of its members.

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Greg Pullman
June 7, 2006
Page 2

UHW personnel assigned "to assist" SEIU Local 715 have also boldly denied that they are working for Local 715, but rather assert that they work for UHW, even though their only possible representational role at the Hospitals would be working for and on behalf of SEIU Local 715. As previously noted, grievances are purportedly being filed by SEIU-UHW in its name on behalf of employees described as its members, even though they are Hospital employees represented exclusively by SEIU Local 715. You even recently wrote to Laurie Quintel directing her to deal with the UHW personnel who are "handling all representational matters," and you have attempted to turn over to UHW personnel the right and responsibility for resolving any issues regarding the agreement recently negotiated on behalf of SEIU Local 715, in which they had and have no cognizable role or place. It certainly appears, from these actions and communication and others, that SEIU Local 715 has abandoned, or is effectively in the process of abandoning, its status as the certified representative.

As a result of, and in response to, these actions and communications, please be formally advised that Stanford Hospital & Clinics and Lucile Packard Children's Hospital do not assent to any assignment of SEIU Local 715's representation rights under its certification to another labor organization, formally or informally. You stated in one of your recent e-mails to Laurie Quintel that the union has the right to select its representatives. The union may have the right to employ personnel from another local to negotiate its contract on its behalf, as it did by using Mr. Vellardita as its chief negotiator, but it does not have the unilateral right to select another labor organization to take on its representational role and rights, at least not in any manner that binds or obligates the Hospitals to recognize and deal with that other labor organization. There are, of course, procedures that must be followed, and criteria that must be met, in order to transfer representational rights. To the Hospitals' knowledge no such procedures have been followed, and no such criteria have been met.

Because of the various above-described circumstances, it is imperative that the Hospitals have an understanding of status of SEIU Local 715 as it relates to the employees at the Hospitals it is certified to represent, and to receive appropriate assurances that SEIU Local 715 remains, in practice and not in name only, the exclusive collective bargaining representative of the bargaining unit employees. If there has not been a transfer of representational responsibilities and control, then the Hospitals must have an understanding of the role which SEIU Local 715 is asking UHW to perform before they can determine whether that is a proper role under the law and whether the Hospitals are obligated to honor that role. If, on the other hand, you contend that there has been a transfer of bargaining rights, please provide information regarding this purported transfer and how it was affected.

The Hospitals certainly stand ready, willing and able to continue honoring their obligations with respect to SEIU Local 715 and to work with your organization as the certified representative of certain of their employees. Indeed, they even hope that a better and more collaborative relationship between the parties can be forged in an environment of mutual respect and mutual adherence to the terms and the spirit of the parties' agreement. Accordingly, they will continue to meet and deal with such representatives of SEIU Local 715 as you may designate and who are employed by SEIU Local 715, while the matter is sorted out. However, until they receive

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Greg Pullman

June 7, 2006

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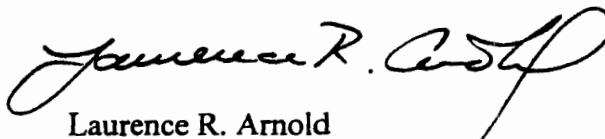
suitable assurances that SEIU Local 715 has not transferred its representational rights and role to UHW, and that SEIU Local 715 is maintaining control of the representational activities of those persons designated by it to represent it, they will no longer meet with representatives of UHW, nor will they respond to their requests, demands or other communications; provide information to their representatives; recognize UHW personnel in any grievance proceeding or investigatory meetings with Hospital employees, or honor requests for participation by UHW personnel.

The Hospitals hope that the issues can be resolved quickly. To that end, please provide to the undersigned information and documentation describing the relationship between your organization and UHW that clearly sets forth the nature of, and limitations on, the latter's role as between the two labor organizations. The Hospitals are willing to review that documentation and other evidence and information promptly to determine whether they are satisfied that SEIU Local 715 is in fact retaining its status as the exclusive representative of the Hospital employees it was certified to represent. The Hospitals are also amenable to meeting promptly with you or an officer of SEIU Local 715 to review the information and to discuss these issues and their concerns if you would prefer such a meeting. To arrange such a meeting, please call either Laurie Quintel or me.

In the mean time, and until that can occur, please immediately designate other representatives employed and controlled by SEIU Local 715 to serve as the representatives of the Hospital employees represented by your organization, since, effective immediately, and until the matter can be resolved, UHW employees will no longer be acknowledged, and have no contractual right of access to the Hospitals or to the employees while on Hospital premises. In the interim, in the absence of SEIU Local 715 representatives being appointed, the Hospitals will look to the stewards and to you to handle the representational activities in the Hospitals.

Again, the Hospitals look forward to a prompt and amicable resolution of the issues.

Sincerely,



Laurence R. Arnold

LRA:sey

cc: Laurie Quintel

Job number : 066

*** SEND SUCCESSFUL ***

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TO:	PHONE #:	FAX #:
Greg Pullman SEIU, Local 715	(408) 954-8715	(408) 954-1538
CC:	PHONE #:	FAX #:
Laune Quintel Stanford Hospital & Clinics	(650) 725-2770	(650) 723-2370

From : Laurence R. Arnold
Email Address : lamold@foley.com
Sender's Direct Dial : 415.984.9819
Date : June 7, 2006
Client/Matter No : 08-437-3000
User ID No : 0054

MESSAGE:

If there are any problems with this transmission or if you have not received all of the pages, please call 415.434.4484, extension 858

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Susan E. Yardley

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LOCAL 715

SERVICE EMPLOYEES INTERNATIONAL UNION, AFL-CIO/CLC

CERTIFIED MAIL

June 14, 2006

Larry Arnold
Foley & Lardner
1 Maritime Plaza #600
San Francisco, CA 94111

Dear Mr. Arnold,

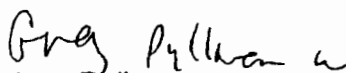
I am writing in response to your inquiry dated June 7, 2006. Your letter is replete with misunderstandings, misstatements and misrepresentations. SEIU Local 715 is the exclusive representative of the collective bargaining unit at Stanford and Lucile Packard Hospitals and we have not ceded that representation to another organization as you allege. We have asked our sister SEIU Local, SEIU-UHW, to provide two employees to help enforce the collective bargaining agreement.

The two employees we have asked SEIU-UHW to provide are under the direction of Local 715 and are there to represent Local 715 and its bargaining unit at Stanford Hospital. That is all that is happening. This practice of providing staff to assist in various activities is quite common among SEIU Locals. Our Local has currently assigned staff to assist other SEIU Locals and the employees of other SEIU Locals have assisted us in the past. In fact, a staff member of our sister Local 817 sat across the table from you and negotiated the current collective bargaining agreement. You raised no objection to that.

The hospitals are currently in violation of Sections 8(a)1 and 8(a)5 of the National Labor Relations Act because you have expressly refused to recognize Local 715 and Ella Hereth and Jocelyn Olick, who report directly to Local 715. The fact that they are "on loan" from SEIU-UHW to assist Local 715 does not allow your client to so flagrantly refuse to carry out its legal duty to continue to recognize and meet with Local 715 and its designated representatives.

It is ironic that in the same letter that you express a desire to improve the relationship between our union and the hospitals, you express objections to working with the people we have assigned as our representatives. I assume that upon receipt of this letter, Stanford Hospital will have the decency to respect the wishes of its employees and meet with the two representatives assigned by Local 715 to the facilities.

Sincerely,


Greg Pullman
Staff Director

cc: Ella Hereth
Jocelyn Olick
William Sokol, esq.
Laurie Quintel

kw opshu29afl-clc/clc © SEIU Local 715/CLC Larry Arnold Ltr 6-14-06

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larnold@foley.com EMAIL

CLIENT/MATTER NUMBER
085437-3044

August 29, 2006

VIA FACSIMILE AND U.S. MAIL

Kristy Sermersheim
Executive Secretary
SEIU Local 715
2302 Zanker Road
San Jose, CA 95131-1115

Re: SEIU Local 715 and SEIU-UHW Representation Issues

Dear Ms. Sermersheim:

Stanford Hospital & Clinics and Lucile Packard Children's Hospital have received and reviewed the "service agreement," copies of which both Greg Pullman and your counsel forwarded. From a review of that document, as well as a review of other documents relating to purported SEIU Local 715 representation by SEIU-UHW representatives, and a comparison of the scope of the duties and relationships between the two organizations as outlined in the agreement provided against the activities engaged in by the persons apparently assigned by SEIU-UHW to the Hospitals, the Hospitals do not believe that the actual arrangements between the unions comport with those set forth in the document. Accordingly, the Hospitals reconfirm their previous communication to Mr. Pullman that they do not recognize the purported service agreement; nor do they recognize as representatives of SEIU Local 715 any personnel from SEIU-UHW.

As also previously communicated to Mr. Pullman, if you wish to assign personnel employed directly by SEIU Local 715 to provide representational functions on behalf of the employees represented exclusively by SEIU Local 715, please notify the Hospitals of the names of those employees of SEIU Local 715. Until then, the Hospitals will continue to abide by their duty to recognize and deal with SEIU Local 715 through the stewards appointed by SEIU Local 715.

In the past, the Hospitals have forwarded correspondence received from SEIU-UHW personnel to Mr. Pullman and have directed responses thereto to him as well, as if the correspondence was received from him initially. In response, they receive further correspondence from the SEIU-UHW personnel. Going forward, and effective immediately, all future correspondence, purported grievances, referrals to arbitration and other communications received from any individuals other than Local 715 employees, designated stewards (or individual employees in the bargaining unit as contemplated by Article 26. with respect to the filing and informal

BOSTON
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FOLEY & LARDNER LLP

Kristy Sermersheim

August 29, 2006

Page 2

resolution of grievances) will be disregarded as not properly sent on behalf of Local 715. In order to avoid problems in resolving issues properly addressed between the Hospitals and the bargaining representative of the unit employees, and to avoid missing the deadlines on grievances, etc., please have the stewards handle all communications regarding such matters unless and until you appoint SEIU Local 715 personnel to handle such matters. Please also advise whether you would like inquiries, notices and other communications initiated by the Hospitals on matters that fall within the realm of collective bargaining or the parties' contractual commitments and obligations, to be directed to you, to Mr. Pullman, to the stewards, or to some other Local 715 employee.

Finally, this is also to advise that the Hospitals will not participate in any meetings or proceeding attended by persons who are employed by SEIU-UHW, and that the Hospitals do not recognize employees of SEIU-UHW as representatives of SEIU Local 715 for purposes of access to Hospital premises.

The Hospitals understand that a reorganization is being imposed upon the various locals of SEIU in California by the International, and that you may have little flexibility or autonomy in these matters, which appear to have been already determined at the International level. However, the Hospitals are obligated to recognize SEIU Local 715, and only SEIU Local 715, as the exclusive representative of the unit employees unless and until proper steps have been taken to change the representative, and doing so *de facto* through a purported service agreement is not the appropriate method.

Sincerely,

A handwritten signature in black ink, appearing to read 'Laurence R. Arnold', written over a horizontal line.

Laurence R. Arnold

LRA:sey

cc: Laurie Quintel



FOLEY & LARDNER LLP

ATTORNEYS AT LAW

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CC:	PHONE #:	FAX #:
Laurie Quintel Stanford Hospital & Clinics	(650) 725-2770	(650) 723-2370

From : Laurence R. Arnold

Email Address : larnold@foley.com

Sender's Direct Dial : 415.984.9819

Date : August 29, 2006

Client/Matter No : 085437-3044

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FOLEY & LARDNER LLP

ATTORNEYS AT LAW
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SAN FRANCISCO CA 94111-3605
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FACSIMILE 415 434 4507
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TO:	PHONE #:	FAX #:
Kristy Sermersheim SF:U Local 715	(408) 954-8715	(408) 954-1538
CC:	PHONE #:	FAX #:
Laurie Quintel Stanford Hospital & Clinics	(650) 725-2770	(650) 723-2370

From : Laurence E. Arnold
Email Address : lanold@foley.com
Sender's Direct Dial : 415.984.9819
Date : August 29 2006
Client/Matter No : 08437-3044
User ID No : 0004

MESSAGE:

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Cover Page 1 of 1

SFCA_396044 1

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Document Pages : 03
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End time : Aug-29 04:37pm
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☎0034#085437#3044#16507232370#

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Quintel, Laurie

From: Robert W. Rutledge [crabycat@sbcglobal.net]
Sent: Wednesday, January 31, 2007 5:29 PM
To: Jeffries, Valerie
Cc: Kassenbrock, Amy; Jocelyn Olick; Quintel, Laurie; Kim Tavaglione
Subject: Layoff meeting

Dear Valerie,

This is a follow-up to my phone earlier today.

As I mentioned in my phone message, I sincerely regret not getting back to you in a more expedient manner. I have a couple suggestions that I hope will be beneficial. First, let me give you my weekly schedule in my hope that this information will move things along. Mondays, Wednesdays and Fridays I attend classes from 08:00-12:00, followed by an hour or so of homework. During this time I do not answer phone calls however I check my messages and return calls when I am able. We have a son who is profoundly handicapped and obviously time consuming and on Tuesdays Thursdays and Fridays I work as a Unit Clerk in the Float Department at LPCH. I give you this information not as an excuse but to allieviate the frustration I sense in your E-mails and voice messages. Another obvious solution would be to contact our UHW Representative, Jocelyn Olick directly, at 510-773-7102. SEIU 715 no longer exists and a service agreement between the former 715 and UHW

has been in place since March first of 2006. With respect to our current layoff bargaining sessions, Myself, Chuck Fonseca, Linda Eskridge, have been the principle agents of these meetings from the beginning.

A situation approved by the Director of Labor Relations and illustrated in Laurie Quintels letter of January 25th 2007 where she asked me to coordinate this impending meeting with Chuck and Linda to find

mutually agreeable time. Moreover, I recall that

Chuck, Linda and I were gracious and accomodating when yourself and May appeared without prior notification acting as primary agents for the hospital after Laurie excused herself shortly after the beginning of our last meeting.

Finally, as I said on the phone, if you maintain your position of refusing the admission of all the bargaining team members, I can only interpret this action as Stanford Hospitals and Clinics is bargaining in bad faith. The Union Insists that change your positon and allow the bagaining access so we can move forward. Thank you Valerie, and all concerned, for your attention to this matter. Very truly yours, Rob Rutledge, SEIU Chief Steward, LPCH

file

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PATRICIA M. GATES, Of Counsel
ROBERTA D. PERKINS, Of Counsel
JONH FLOTZ, Of Counsel

Also admitted in Arizona
Also admitted in Hawaii
Also admitted in Nevada

March 5, 2007

VIA FACSIMILE & U.S. MAIL

Laurie Quintel
Stanford Hospital & Clinics
300 Pasteur Drive
Stanford, CA 94305-5250

Re: Local 715 Status

Dear Ms. Quintel:

I am writing in response to a letter you addressed to Kristy Sermersheim, the Executive Secretary of SEIU Local 715, regarding "Local 715 Status," of which I just received today, and which appears to have been sent by you on March 2, 2007.

Please rest assured that SEIU Local 715 continues to exist, continues to represent a collective bargaining unit of employees at the Stanford University Medical Center and the Lucile Packard Children's Hospital, and will continue to do so for the indefinite future. There has been no change in Local 715's status, and therefore, you should continue to remit dues to Local 715, which represents the employees at your institutions.

If you have any questions, please do not hesitate to contact me.

Sincerely,

William A. Sokol

[Dictated but not read]

WAS/rfb
opeiu 3 afl-cio(1)
cc: Kristy Sermersheim

1/450501

GC Exhibit # 26

LOS ANGELES OFFICE
3435 Wilshire Boulevard, Suite 520
Los Angeles, CA 90010-1907
TEL 213.380.2344 FAX 213.381.1088

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428 J Street, Suite 520
Sacramento, CA 95814-2341
TEL 916.443.6600 FAX 916.442.0244

HONOLULU OFFICE
1099 Alaheka Street, Suite 1602
Honolulu, HI 96813-4500
TEL 808.528.8880 FAX 808.528.8881

APR-09-2007 13:47 From:

16587232370

J14154344507

P.3/5

04-09-2007 02:18pm From: Weinberg, Roger & Rosenfeld

3371023

T-763 P.002/004 F-039

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ROBERTA B. PETERING, Of Counsel
JOHN PLOTZ, Of Counsel

* About 300 copies of this letter
are distributed in the
San Jose area in the
San Jose area in the
San Jose area in the

April 9, 2007

VIA FACSIMILE & U.S. MAIL

Laurie Quintel
Stanford Hospital & Clinics
300 Pasteur Drive
Stanford, CA 94305-5250

Re: Request for Information Change in Local 715 Affiliating

Dear Ms. Quintel:

Your letter dated March 29, 2007, regarding a "request for information change in Local 715 affiliating," has been forwarded to me Local 715 for a response. All of the information that you have requested is irrelevant to the parties bargaining process, is equally available to Stanford Hospital, and/or involves information of another Local Union that does not have any collective bargaining relationship with Stanford Hospital. Therefore, the Union has no duty to provide you with any of the information requested in your letter. I will, however, address each of your information requests one-by-one so that you know exactly what the Union's position is.

First, you request the "identity of officers, directors, executives, and managerial employees of SEIU Local 715." This request is not relevant to the collective bargaining process, and is equally available to Stanford Hospital. In addition, this information is protected from disclosure by the National Labor Relations Act, the First Amendment of the United States Constitution, as well as on public policy grounds.

Second, you request the "identity of officers, directors, executives, and managerial employees of SEIU Local 521." This request is not relevant to the collective bargaining process, is equally available to Stanford Hospital, and involves a completely different Local than 715. I do not know of any legal basis for you to demand that Local 715 provide information regarding a completely different Local Union that Stanford Hospital does not have a collective bargaining relationship with.

Third, you request the "identity of Local 715's employees." This request is not relevant to the collective bargaining process, and is equally available to Stanford Hospital. In addition, this information is protected from disclosure by the National Labor Relations Act, the First Amendment of the United States Constitution, as well as on public policy grounds.

PR-09-2007 13:47 From:

16507232370

.o:914154344507

P. 4/5

04-09-2007 02:18pm From: Weinberg, Roger & Rosenfeld

3371023

T-769 P.003/004 F-013

April 9, 2007

Laurie Quintel

Page 2

Fourth, you request the "identity of all individuals authorized to act on behalf of Local 715." This request is not relevant to the collective bargaining process, and is equally available to Stanford Hospital. Moreover, it is vague and ambiguous, as well as overbroad.

Fifth, you request the "identity of all individuals who receive paychecks reflecting the name and address of the legal entity of the employer as Local 715, pursuant to California Labor Code 226(a)(8)." This request is not relevant to the collective bargaining process. Nor is the Union obligated to provide Stanford Hospital information regarding the Union's operating expenses. See *Serv. Employees Local 535 (No. Bay Reg'l Ctr.)*, 287 NLRB 1223 (1998). In addition, this information is protected from disclosure by the National Labor Relations Act, the First Amendment of the United States Constitution, as well as on public policy grounds.

Sixth, you request "the current organization chart of Local 715." This request is not relevant to the collective bargaining process. In addition, this information is protected from disclosure by the National Labor Relations Act, the First Amendment of the United States Constitution, as well as on public policy grounds.

Seventh, you request "the current organization chart of Local 521." This request is not relevant to the collective bargaining process. I do not know of any legal basis for you to demand that Local 715 provide information regarding a completely different Local Union that Stanford Hospital does not have a collective bargaining relationship with.

Eighth, you request "SEIU Local 715's current bylaws." This request is not relevant to the collective bargaining process.

Ninth, you request "SEIU Local 521's current bylaws." I do not know of any legal basis for you to demand that Local 715 provide information regarding a completely different Local Union that Stanford Hospital does not have a collective bargaining relationship with.

Tenth, you request "a description of Local 715's current assets." This request is not relevant to the collective bargaining process. Nor is the Union obligated to provide Stanford Hospital information regarding the Union's operating expenses. See *Serv. Employees Local 535 (No. Bay Reg'l Ctr.)*, 287 NLRB 1223 (1998). In addition, this information is protected from disclosure by the National Labor Relations Act, the First Amendment of the United States Constitution, as well as on public policy grounds.

Eleventh, you request "a description of Local 521's current assets." I do not know of any legal basis for you to demand that Local 715 provide information regarding a completely different Local Union that Stanford Hospital does not have a collective bargaining relationship with.

Twelve, you request "any documents filed with the state of California or the U.S. Department of Labor regarding any change in the status of SEIU Local 715. This request is not relevant to the collective bargaining process, and is equally available to Stanford Hospital.

Finally, I note that the information requested in your letter appears to be the same type of information that Stanford Hospital is attempting to obtain through the discovery process in the

APR-09-2007 13:48 From:

16507232370

:914154344507

P.5/5

04-09-2007 02:18pm From:Weinberg, Roger & Rosenfeld

3371023

T-763 P.004/004 F-033

April 9, 2007
Laurie Quintel
Page 3

pending lawsuit between Stanford Hospital and Local 715. Most importantly, you sent your letter just days after Stanford Hospital attempted to obtain this irrelevant information through the deposition of Local 715's person most knowledgeable. In any event, your letter appears to be an illegitimate attempt to bypass the discovery process. If you have any questions, please do not hesitate to contact me.

Sincerely,


Bruce A. Harland

BAH/not
cc: Client
113889/434034

APR-09-2007 13:47 From:

16507232370

14154344507

P.2/5

04-09-2007 02:17pm From: Weinberg, Roger & Rosenfeld

3371023

T-788 P.001/004 F-023

WEINBERG, ROGER & ROSENFELD

A Professional Corporation

1001 Marina Village Parkway, Suite 200

Alameda, CA 94501-1091

Voice: 510.337.1001

Fax: 510.337.1023

DATE: Monday, April 09, 2007

Confirmation: rfb

FROM: Bruce A. Harland**RE: "Request for Information Change in Local 715 Affiliation"****PLEASE DELIVER AS SOON AS POSSIBLE TO:**

RECIPIENT:	FAX #	PHONE #
Laurie Quintel Stanford Hospital & Clinics	+1 (650) 723-2370	(650) 725-2770

Total number of pages including this page: 4

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PEDER J. THOREN
JONATHAN WEISSGLASS

June 18, 2007

Via Facsimile & U.S. Mail

Laurie J. Quintel
Director, Employee and Labor Relations
Stanford Hospital and Clinics, Lucile Packard Children's Hospital
300 Pasteur Drive
Stanford, CA 94305-5513

Re: Request for Information related to Local 715

Dear Ms. Quintel:

As you are aware, pursuant to an order by Service Employees International Union ("SEIU") President Andrew L. Stern, SEIU Local 715 ("Union" or "Local 715") has been placed in trusteeship and Rusty Smith has been appointed Trustee of Local 715. I have been retained to represent the Trustee, and write in response to your information request dated March 29, 2007.

Pursuant to the Constitution and Bylaws of SEIU and the trusteeship order, the officers and directors of Local 715 have been removed, and Trustee Smith has sole authority to manage and direct the affairs of the Local. Local 715's bylaws have also been suspended during the period of the trusteeship. I trust that this information responds to your requests Nos. 1 and 8.

Several of your information requests seek information about Local 521, purportedly because the employer is concerned that Local 521 might seek representational rights with respect to the bargaining unit at Stanford Hospital & Clinics/Lucile Packard Children's Hospital ("Stanford Hospital"). However, as Mr. Harland previously made clear, and as I will reiterate, Local 715 – not Local 521 – represents the Stanford Hospital bargaining unit. Local 715 has not

Laurie J. Quintel

June 18, 2007

Page 2

asked Stanford Hospital to have any dealings whatsoever with Local 521. Accordingly, none of the information sought regarding Local 521 is relevant to the collective bargaining relationship between Stanford Hospital and Local 715.

Local 715 responds to your remaining information requests as follows. With respect to information requests 3 and 5, the Union notes that the question of whether it has paid employees is irrelevant to its ability to carry out its collective bargaining responsibilities, and thus the Employer has no legitimate right to this information. Subject to this objection, the Trustee responds that there are not currently any paid employees of Local 715.

With respect to information request 4, I reiterate Mr. Harland's complaint that the request is vague and ambiguous. To the extent the request seeks the identities of individuals authorized to engage in collective bargaining activities on behalf of Local 715, Trustee Smith wrote to you on June 14, 2007, and informed you that he had been appointed Trustee and that "all matters relating to the representation of the employees" under Stanford Hospital's collective bargaining agreement with Local 715 "will be handled under [his] direction." Trustee Smith's letter further informed you that Kim Tavaglione, Joceyn Olick, and Ella Hereth would continue to be the representatives responsible for the Stanford Hospital unit. Moreover, Stanford Hospital is already aware of the servicing agreement between Local 715 and UHW, an agreement Trustee Smith informed you would be unaffected by the trusteeship. Accordingly, Stanford Hospital possesses the only responsive information to which it is entitled.

With respect to information request 7, which requests an "organization chart" of Local 715, I am unclear what specific information is sought. An employer is not entitled to information that would reflect internal union communications, or that would intrude on a union's associational privacy rights. Subject to these objections, Local 715 responds that it does not possess a chart reflecting the organization's current internal structure.

Finally, with respect to information request 12, the Trustee is currently unaware of any responsive document in the possession of Local 715.

Thank you for your attention to this matter.

Sincerely,



Barbara J. Chisholm

Attorney for Trustee of SEIU Local 715

cc: B.W. ("Rusty") Smith
Laurence R. Arnold, Esq.

ALTSHULER BERZON LLP

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JUL 02 2007

June 29, 2007

Via Facsimile and U.S. Mail

David C. Nevins
Arbitrator
3145 Geary Boulevard, No. 751
San Francisco, CA 94118

**Re: Service Employee International Union, Local 715 and
Stanford Hospital & Clinics
Joe Hayes Termination Arbitration**

Dear Mr. Nevins:

This letter is to confirm that Jeffrey B. Demaine and Stacey Leyton from our office will be appearing on behalf of Local 715 in the arbitration currently scheduled for July 10, 2007, in the above-referenced matter. Please contact me if you have any questions.

Sincerely,



Barbara J. Chisholm

cc: Laurence Arnold ✓
Nina Kani
B.W. "Rusty" Smith

GC Exhibit #

56E

ALTSHULER BERZON LLP

ATTORNEYS AT LAW

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JONATHAN WEISSGLASS

July 3, 2007

VIA FACSIMILE AND FIRST CLASS MAIL

David C. Nevins, Esq.
Arbitrator
3145 Geary Boulevard, No. 751
San Francisco, CA 94118

**Re: Service Employee International Union, Local 715 and
Stanford Hospital & Clinics
Joe Hayes Termination Arbitration**

Dear Arbitrator Nevins:

This letter is to inform you that Vin Harrington and Andrea Laiacona from the Weinberg Roger & Rosenfeld law firm will be appearing on behalf of Local 715 in the arbitration currently scheduled for July 10, 2007, in the above-referenced matter, in place of Altshuler Berzon. The subpoena issued by my office on Monday, July 2 remains in effect. Please contact Mr. Harrington or Ms. Laiacona if you have any questions.

Thank you for your consideration.

Sincerely,



Jeffrey B. Demain

cc: Laurence Arnold, Esq. (via facsimile only)
Nina Kani, Esq. (via facsimile only)
B.W. "Rusty" Smith (via facsimile only)
Vin Harrington, Esq. (via facsimile only)
Andrea Laiacona, Esq. (via facsimile only)

07/03/2007 11:09 FAX 415362806

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FACSIMILE COVER SHEET

TO: Laurence R. Arnold, Esq.
Nina Kani, Esq.

FAX #: 415-434-4507

DATE: July 3, 2007

PAGES: 2 (including cover page)

FROM: Jeffrey B. Demain, Esq.

RE: Stanford Hospital & Clinics and SEIU, Local 715
Joe Hayes Termination Arbitration

MESSAGE: Please see attached.

GC Exhibit # 56D

IF YOU ENCOUNTER PROBLEMS RECEIVING THIS TRANSMISSION, PLEASE CALL (415) 421-7151.

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www.seiu715.org

LOCAL 715

SERVICE EMPLOYEES INTERNATIONAL UNION

July 26, 2007

CERTIFIED MAIL 7007 0220 0001 4286 9248

Laurie J. Quintel, Director
Employee and Labor Relations
Stanford Hospital and Clinics
300 Pasteur Drive – M/C 5513
Stanford, CA 94305-5513

Dear Ms. Quintel:

In my letter of June 18, 2007, received in your office on June 20, 2007, I informed you that SEIU President Andrew Stern has placed Local 715 into trusteeship and has appointed me trustee and that, "all matters relating to the representation of the employees or your organization under the Local 715 collective bargaining agreement will be handled under my direction."

I further informed you that the representatives assigned to represent Local 715 members and Stanford and Lucille Packard Hospitals and Clinics were Kim Tavaglione, Jocelyn Olick, and Ella Hareth.

At this time, please add Michelle (Chelli) Guzman to the list of authorized representatives of Local 715 pursuant to the servicing agreement with United Healthcare Workers – West.

If you have any questions, please feel free to call me at 408-316-4460.

Sincerely yours,

B. W. (Rusty) Smith
International Trustee

C: Kim Tavaglione
JJ Johnston
Bill Sokol
BJ Chisholm

BW:ch 02007SEIULocal715-Trusteeship-Stanford-LQuintelltrerepresent-072607

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Redwood City Office: 891 Marshall Street, Redwood City, CA 94063 • (650) 365-8715 • Fax (650) 365-7956
Stanford Office: P.O. Box 19152, Stanford, CA 94309 • (650) 723-3680 • Fax (650) 723-3650

Affiliated SEIU 1972

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CHRISTIAN L. RAUBER
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MATTHEW J. GALLER
ASHLEY K. KEDA
LINDA BALDWIN JONES
PATRICIA A. DAVIS
ALAN G. CROWLEY
J. FELIX DE LA TORRE
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PATRICIA M. GATES, Of Counsel
ROBERTA G. PERSONE, Of Counsel

* Also admitted in Arizona
** Admitted in Hawaii
*** Also admitted in Nevada
**** Also admitted in Illinois

August 22, 2007

VIA FACSIMILE & U.S. MAIL

Laurie Quintel
Director-Employee and Labor Relations
Stanford Hospital & Clinics
300 Pasteur Drive
Stanford, CA 94305-5250

Re: Your August 16, 2007 Memorandum to
Jesus Andrade and Robert Rutledge, SEIU Local 715
"Revised Substance Abuse Free Workplace Policy"

Dear Ms. Quintel:

This office represents SEIU Local 715. I am writing in response to your August 16, 2007 memorandum.

Local 715 demands that the employer cease and desist from implementing any modified or new policy applicable to bargaining unit employees as described in your memorandum, and its attachment. The establishment or modification of substance abuse policies, and work rules associated with it are mandatory subjects of bargaining, and Local 715 does not consent to the employer's implementation of any such policies until or unless the bargaining obligation imposed upon the employer by the National Labor Relations Act is fully met.

Please provide me, as representative of Local 715, with copies of any existing policies concerned with "substance abuse," a "substance abuse-free workplace," or drug or alcohol use/abuse applicable to any employee of Stanford Hospital and Clinics, or Lucile Packard Children's Hospital, at any time since June 1, 2004. Please provide me with the material at the above-referenced Alameda office address.

GC Exhibit # 42

August 22, 2007
Laurie Quintel
Page 2

In the meantime, we are available to meet and bargain with you concerning this proposed policy, or amendment to the policy, on August 29 or August 30, 2007. Please advise me of your availability.

Sincerely,

A handwritten signature in black ink, appearing to read 'V. A. Harrington, Jr.', with a long horizontal line extending to the right.

Vincent A. Harrington, Jr.

VAH/map
opeiu 3 afl-cio(1)
1/467391

11-20-2007 08:34

From: Weinberg, Roger & Rosenfeld

3371023

T-794 P.002/003 F-082

WILLIAM A. BOND
VINCENT A. HARRINGTON, JR.
W. DANIEL BOONE
OLYMPIA MICHELSON
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* Also admitted in Nevada
* Also admitted in Idaho

November 19, 2007

Thomas Angelo
Arbitrator
P.O. Box 1937
Mill Valley, CA 94942

Laurence R. Arnold
Foley & Lardner LLP
One Maritime Plaza, 6th Floor
San Francisco, CA 94111-3409

Re: Stanford Hospital & Clinics/Lucile Packard Children's Hospital
and
SEIU Local 715 (Victor Acosta)
FMCS Case No.: 070420-55892-A

Dear Gentlemen:

This letter is jointly addressed to Arbitrator Angelo, and employer attorney Arnold, because Mr. Arnold sent a copy of his November 7, 2007 letter to Barbara Chisholm to the Arbitrator.

First, Mr. Angelo, you should know that this firm represents the Union in this case. Our office participated in striking from the FMCS list with Mr. Arnold for your selection. We informed you of your selection by letter dated May 16, 2007, I am the attorney assigned to advocate this case on behalf of the Union on November 28, 2007.

The collective bargaining agreement is entered into between Stanford Hospital and Clinics and SEIU Local 715. I will be appearing and stating my appearance on behalf of SEIU Local 715. I made exactly that statement of appearance in a recent arbitration on a different discharge case with Mr. Arnold, and without incident. Although I am sure that Mr. Arnold would like to know whether and how much I am being paid for this arbitration, it is none of his business.

In addition, a Union representative will appear with me and the grievant at the arbitration. Mr. Arnold has a separate agenda, the nature of which is something of a mystery to me, but the designation of the Union representative appearing on this case is not for Mr. Arnold to question or challenge. Whether it be during collective bargaining negotiations, or at arbitration, each party may designate its representative.

11-20-2007 08:34 From: Weinberg, Roger & Rosenfeld

3371023


T-704 P.003/003 F-002

November 19, 2007
Thomas Angelo
Laurence R. Arnold
Page 2

By this letter, I request that Arbitrator Angelo communicate to the employer and to Mr. Arnold that the November 28, 2007 arbitration will proceed regardless of Mr. Arnold's protestations about my appearance, the payment arrangements between our office and the Union, and the identity of the party representative for the Union.

Finally, because it appears that Mr. Arnold may refuse to appear and participate, we request that the arbitration be held in our offices in Alameda, so that it may go ahead even if the employer refuses to participate or cooperate. Of course, if the "objections" are withdrawn, then we can proceed in a proper, mature labor-relations fashion.

Sincerely,



W. Daniel Boone

WDB/MPB
opeiu 3 afl-cio(1)
Enclosure
115888/476051

11-20-2007 08:34

From-Weinberg, Roger & Rosenfeld

3371023

T-794 P.001/003 F-092

WEINBERG, ROGER & ROSENFELD

A Professional Corporation
1001 Marina Village Parkway, Suite 200
Alameda, CA 94501-1091

Voice: 510.337.1001
Fax: 510.337.1023

DATE: Tuesday, November 20, 2007

Confirmation: MPB

FROM: W. Daniel Boone

PLEASE DELIVER AS SOON AS POSSIBLE TO:

RECIPIENT:	FAX #	PHONE #
Thomas Angelo Arbitrator	(415) 380-9792	(415) 381-1701
Laurence R. Arnold Foley & Lardner LLP	(415) 434-4507	(415) 984-9819 (Direct)

Total number of pages including this page: 3.
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PLEASE NOTE: The information contained in this facsimile message is privileged and confidential, and is intended only for the use of the individual named above and others who have been specifically authorized to receive it. If you have received this communication in error, or if any problems occur with transmission, please notify us immediately by telephone. Thank you.



www.seiu715.org

LOCAL 715

SERVICE EMPLOYEES INTERNATIONAL UNION, CLC

December 19, 2007

CERTIFIED MAIL 7007 0220 0001 4285 0758

Laurie Quintel, Director
Employee and Labor Relations
Stanford Hospital and Clinics
300 Pasteur Drive - M/C 5513
Stanford, CA 94305-5513

RECEIVED

DEC 27 2007

VP, HUMAN RESOURCES

Dear Ms. Quintel:

As you know, I was appointed as the Trustee of SEIU, Local 715 by the International Union. As Trustee of SEIU, Local 715, I am appointing Myriam Escamilla, as of this date, as an Assistant to the Trustee of Local 715 with the authority to represent bargaining unit members at Stanford Hospital and Lucile Packard's Children's Hospital.

Sincerely

B.W. (Rusty) Smith
International Trustee, SEIU Local 715

cc: Myriam Escamilla
Bruce Harland
Norm Gleichman

RS:ch @2007SEIU521/CTW-CLC-Stanford Hospital-LQuintelltreMEscamillaAssistru-121907

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LOCAL 715

SERVICE EMPLOYEES INTERNATIONAL UNION, CLC

rec'd 2.19.08

February 12, 2008

Laurie Quintel, Director
Employee and Labor Relations
Stanford Hospital and Clinics
300 Pasteur Drive - M/C 5513
Stanford, CA 94305-5513

Dear Ms. Quintel:

This is in response to your letter dated February 6, 2008. I have stated over and over again, as the Trustee of Local 715, appointed by the International Union, Local 715 continues to exist and continues to represent bargaining unit members at Stanford Hospital and Clinics and Lucile Packard Children's Hospital. As you know, the Union continues to represent members at the hospitals and, among other things, the Union continues to process grievances on behalf of members (grievances that the hospitals unfortunately refuse to process or arbitrate), and the Union's stewards continue to meet with hospital representatives in Labor-Management meetings.

As to your claim that workers at Stanford and Lucile Packard Children's Hospital have independently contacted the United Healthcare Workers -- West, I am in no position to control the actions of those workers. They are free to do this if they choose to. Indeed, Local 715 will support the will of the majority and will respect any choice that workers make. We hope that the hospitals will do the same, as you have stated in previous correspondence to workers, indicating that you honor their right to choose their own representatives.

In the meantime, however, I reiterate that the contract between Local 715 and Stanford and Lucile Packard Children's Hospitals continues in full force and effect, and Local 715, as the exclusive representative of bargaining unit members at the hospitals, will continue to vigorously represent those workers until a majority of them choose a different representative.

If you have any questions, please do not hesitate to contact me.

Sincerely,

B.W. (Rusty) Smith
International Trustee Local 715, SEIU

c: Myriam Escamilla, Bruce Harland, Norm Gleichman

RB:bw @2008-SEIU521/CTW-CLC Stanford Hospital Laurie Quintel Ltr 2-12-08

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